

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY
(APWU/USPS-T4—31)
(March 27, 2012)**

The United States Postal Service provides the response of witness Neri (USPS-T-4) to the above-listed interrogatory of the American Postal Workers Union, AFL-CIO, dated March 13, 2012. The response to APWU/USPS-T4—32 is forthcoming. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T4-31 Please refer to your response to APWU/USPS-T5-6(c) redirected to you from Witness Bratta, where you state in part, “[e]xcess equipment or equipment deployed to other facilities is individually justified outside of the AMP analysis.”

a) Does this mean that the costs attributed to excess equipment that must be stored is not considered in the AMP study?

b) Please also provide an example of how this equipment is “justified outside of the AMP analysis?”

RESPONSE:

a-b) Please see Transcript Vol. 5/2006 line 22 to page 2009 line 15.